State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al. **Project Name/Number:** /NIC12 PDB50513 et.al.

Filing at a Glance

Company: Transamerica Life Insurance Company

Product Name: NIC12 PDB50513 et.al.

State: Arkansas

TOI: A03I Individual Annuities - Deferred Variable

Sub-TOI: A03I.002 Flexible Premium

Filing Type: Form

Date Submitted: 12/20/2012

SERFF Tr Num: AEGA-128797171

SERFF Status: Closed-Approved-Closed

State Tr Num:

State Status: Approved-Closed

Co Tr Num: NIC12 PDB50513 ET.AL.

Implementation On Approval

Date Requested:

Author(s): Laurie Bascom
Reviewer(s): Linda Bird (primary)

Disposition Date: 01/03/2013

Disposition Status: Approved-Closed

Implementation Date:

State Filing Description:

Company Tracking #: NIC12 PDB50513 ET.AL.

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al. **Project Name/Number:** /NIC12 PDB50513 et.al.

General Information

Project Name: Status of Filing in Domicile: Pending

Project Number: NIC12 PDB50513 et.al.

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Overall Rate Impact: Filing Status Changed: 01/03/2013
State Status Changed: 01/03/2013

Deemer Date: Created By: Laurie Bascom

Submitted By: Laurie Bascom Corresponding Filing Tracking Number:

Filing Description:

Life and Health Division
Arkansas Insurance Department
1200 West Third Street
Little Rock, AR 72201

RE: Transamerica Life Insurance Company

NAIC # 468 - 86231

SERFF Tracking #: AEGA-128797171

NIC12 PDB50513- Policy Data Page – 5 year Surrender Charge

NIC12 RDR30513- Waiver of Surrender Charge Rider

NIC12 PDC50513- Policy Data Page – Waiver of Surrender Charge

NIC12 RLS20513- Surrender Charge Modification Rider

NIC12 PDBL0513- Policy Data Page – 4 year Surrender Charge

NIC12 RGMD50513- Guaranteed Minimum Death Benefit Rider

NIC12 RGMD80513- Guaranteed Minimum Death Benefit Rider

NIC12 AE13050513- Amendatory Endorsement

Dear Sir or Madam:

We are filing the enclosed forms for your review and approval. These are new forms and are not intended to replace any forms previously approved by your Department. These forms are intended for use with our Modified Flexible Premium Deferred Variable Annuity product, policy form number NIC12 VA0513 and Policy Data pages NIC12 PDB0513, NIC12 PDC0513, NIC12 PDL0513 and NIC12 PDX0513, when applicable, approved by your Department on 11/28/2012 under SERFF filing number AEGA-128770488.

Policy Data Page

Form NIC12 PDB50513 is a new Policy Data Page which has a 5 year withdrawal/surrender charge scale.

Waiver of Surrender Charge Rider

Rider form NIC12 RDR30513 is an optional rider available at policy issue only and is used with a new Policy Data Page NIC12 PDC50513. When rider ICC12 RDR30513 is elected, all surrender charges will be waived and an increased mortality and expense risk fee and administrative charge is reflected on the rider and Policy Data Page.

SERFF Tracking #: AEGA-128797171 State Tracking #:

Company Tracking #: NIC12 PDB50513 ET.AL.

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al. **Project Name/Number:** /NIC12 PDB50513 et.al.

Surrender Charge Modification Riders

Rider form NIC12 RLS20513 is an optional rider available at policy issue only and is used with a new Policy Data Page NIC12 PDBL0513. When rider ICC12 RLS20513 is elected, the surrender charge period is reduced to 4 years and an increased mortality and expense risk fee and administrative charge is reflected on the rider and Policy Data Page.

Death Benefit Rider

Rider forms NIC12 RGMD50513 and NIC12 RGMD80513 are optional death benefit riders available at policy issue only. When rider NIC12 RGMD50513 is elected, the Guaranteed Minimum Death Benefit (GMDB) applicable to the policy form will be an Annual Step-up to age 81 Death Benefit. When rider NIC12 RGMD80513 is elected, the GMDB applicable to the policy form will be a Return of Premium Death Benefit. The Fees for these riders are included in the mortality and expense risk fee and the administrative charge which is shown on the Policy Data pages.

Amendatory Endorsement

Endorsement NIC12 AE13050513 will be attached to new issues of our annuity portfolio if the annuity is issued to a qualified plan as described under Section 401 of the Internal Revenue Code. The form will be made part of the policy at issue and also can be used after the date of issue.

The enclosed forms are subject to federal jurisdiction and accordingly the Flesch requirements do not apply. The Separate Account underlying this filing complies with or has been authorized by the state of domicile, including Commissioner approval if required. No filing is required for separate accounts in lowa, our state of domicile.

We have attached Statements of Variability for the applicable attached forms.

For the Death Benefit Riders we have attached the applicable Actuarial Memorandum. We did not include an Actuarial Memorandum for the Amendatory Endorsement, Policy Data Pages, Waiver of Surrender Charge Rider and Modification of Surrender charge Rider since compliance was demonstrated with the original filing of the policy that these forms would incorporate. The original actuarial materials reflected a worst case scenario of the various data pages we plan to use on the policy with an 8-year premium payment date surrender charge schedule of 8/8/7/6/5/4/3/0%. The surrender charge schedules that correspond to this filing are for 5 years (5/4/3/2/1/0%) and 4 years (8/8/7/6/0%).

We would appreciate your review and approval of these forms.

Sincerely,

Transamerica Life Insurance Company

Laurie Bascom Intermediate Filing Analyst Legal/Compliance Department Transamerica Capital Management

Phone: 319-355-6813; Fax: 319-355-6820 Email: laurie.bascom@transamerica.com

Company and Contact

SERFF Tracking #: AEGA-128797171 State Tracking #:

Company Tracking #: NIC12 PDB50513 ET.AL.

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al. **Project Name/Number:** /NIC12 PDB50513 et.al.

Filing Contact Information

Laurie Bascom, Forms Filing Analyst II lbascom@aegonusa.com 4333 Edgewood Road, NE 319-355-6813 [Phone] Cedar Rapids, IA 52499 319-355-6820 [FAX]

Filing Company Information

Transamerica Life Insurance CoCode: 86231 State of Domicile: Iowa

Company Group Code: 468 Company Type: 4333 Edgewood Road, NE Group Name: State ID Number:

Cedar Rapids, IA 52499 FEIN Number: 39-0989781

(319) 355-8511 ext. [Phone]

Filing Fees

Fee Required? Yes
Fee Amount: \$400.00

Retaliatory? No

Fee Explanation: 8 forms X \$50/form

Per Company: No

CompanyAmountDate ProcessedTransaction #Transamerica Life Insurance Company\$400.0012/20/201265942894

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al.
Project Name/Number: /NIC12 PDB50513 et.al.

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	01/03/2013	01/03/2013

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al. **Project Name/Number:** /NIC12 PDB50513 et.al.

Disposition

Disposition Date: 01/03/2013

Implementation Date: Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Statement of Variability		Yes
Form	Policy Data Page - 5 year Surrender Charge		Yes
Form	Waiver of Surrender Charge Rider		Yes
Form	Policy Data Page - Waiver of Surrender Charge		Yes
Form	Surrender Charge Modification Rider		Yes
Form	Policy Data Page - 4 year Surrender Charge		Yes
Form	Guaranteed Minimum Death Benefit Rider		Yes
Form	Guaranteed Minimum Death Benefit Rider		Yes
Form	Amendatory Endorsement		Yes

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al.
Project Name/Number: /NIC12 PDB50513 et.al.

Form Schedule

Lead	Lead Form Number:							
Item No.	Schedule Item Status	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments
1		Policy Data Page - 5 year Surrender Charge	NIC12 PDB50513	SCH	Initial			NIC12 PDB50513 - Axiom II Spec.pdf
2		Waiver of Surrender Charge Rider	NIC12 RDR30513	POLA	Initial			NIC12 RDR30513 - Access Rider.pdf
3		Policy Data Page - Waiver of Surrender Charge	NIC12 PDC50513	SCH	Initial			NIC12 PDC50513 - Axiom II with Access Rider Spec.pdf
4		Surrender Charge Modification Rider	NIC12 RLS20513	POLA	Initial			NIC12 RLS20513 - Liquidity Rider.pdf
5		Policy Data Page - 4 year Surrender Charge	NIC12 PDBL0513	SCH	Initial			NIC12 PDBL0513 B-Share with Liquidity Rider Spec.pdf
6		Guaranteed Minimum Death Benefit Rider	NIC12 RGMD5051 3	POLA	Initial			NIC12 RGMD50513 Annual Step-Up GMDB Rider.pdf
7		Guaranteed Minimum Death Benefit Rider	NIC12 RGMD8051 3	POLA	Initial			NIC12 RGMD80513 Return of Premium GMDB Rider.pdf

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al.
Project Name/Number: /NIC12 PDB50513 et.al.

Lead	Lead Form Number:							
Item	Schedule Item	Form	Form	Form	Form	Action Specific	Readability	
No.	Status	Name	Number	Type	Action	Data	Score	Attachments
8		Amendatory	NIC12	POLA	Initial			NIC12
		Endorsement	AE1305051					AE13050513 -
			3					Qualified
								Endorsement.pdf

Form Type Legend:

	·		
ADV	Advertising	AEF	Application/Enrollment Form
CER	Certificate	CERA	Certificate Amendment, Insert Page, Endorsement or Rider
DDP	Data/Declaration Pages	FND	Funding Agreement (Annuity, Individual and Group)
MTX	Matrix	NOC	Notice of Coverage
отн	Other	OUT	Outline of Coverage
PJK	Policy Jacket	POL	Policy/Contract/Fraternal Certificate
POLA	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider	SCH	Schedule Pages

SECTION 2 – POLICY DATA

Policy Information

Policy Number:	[12345]
Policy Date:	May 1, 2013
Income Tax Status of the Policy:	Non-Qualified
Initial Premium Payment:	\$5,000.00
Last Available Annuity Commencement Date:	May 31, 2077
Death Benefit Option:	Policy Value

Annuitant(s) Information

Annuitant(s):	John Doe
Primary Annuitant's Issue Age/Sex:	35 / Male

Owner(s) Information

Owner(s):	John Doe
Primary Owner's Issue Age/Sex:	35 / Male

Rate Information for Fixed Account, if offered

Fixed Account Guaranteed Minimum Effective Annual Interest Rate:*	0.25%
Minimum Nonforfeiture Interest Rate:**	1.00%

^{*}This rate applies for the life of the policy.

Regarding the Excess Interest Adjustment (EIA) feature:

- a. The guaranteed elements used to determine any EIA are the minimum guaranteed and current declared interest rates applicable to the Fixed Account;
- b. Declared interest rates used in computing any EIA may change from time to time (subject to Fixed Account Guaranteed Minimum Effective Annual Interest Rate), which may affect the benefits available under Your policy; and
- c. The U.S. Treasury rate may be used as a substitute for the current declared interest rate in the EIA formula as specified in Your policy.

NIC12 PDB50513 Page 5(a)

^{**}This rate applies for the life of the policy. This rate is used in the calculation of Your Minimum Required Cash Value. Your Minimum Required Cash Value reflects a 12.50% reduction in premiums and transfers to the Fixed Account and a \$50 annual expense allowance. See the definition of Minimum Required Cash Value for the details of this calculation.

Minimum Premium Payments

Minimum Initial Premium Payment:	Non-Qualified -\\$5,000 Qualified -\\$1,000
Minimum Subsequent Premium Payment:	[\$50]

Maximum Premium Payments (without prior Company Approval)

	Issue Age 0-80*	Issue Age 81+*
Total during the 1st Policy Year:	\$1,000,000	\$500,000
Total during each Policy Year After 1st Policy Anniversary:	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit
Cumulative Maximum Premiums - Life of Policy:	\$1,000,000	\$500,000

^{*} Issue Age is the greater of the Owner(s)' or Annuitant(s)' age.

Mortality and Expense Risk Fee and Administrative Charge

Before the Annuity Commencement Date:	[1.00%]
After the Annuity Commencement Date:	[1.25%]

Withdrawal/Surrender Charges

Number of Years Since Premium Payment Date:	0-1	1-2	2-3	3-4	4-5	5 or more
Charge (% of Premium Withdrawn or Surrendered):	8%	8%	7%	6%	5%	0%

The amount paid on Surrender will never be less than the greater of the following amounts:

- a. Cash Value described in Section 5; and
- b. Minimum Required Cash Value.

NIC12 PDB50513 Page 5(b)

Service Charge

Service Charge at the Time of Issue:	[\$35]
Maximum Annual Service Charge:	[\$55]

The Company may waive some or all of Your service charge each year based on Your Policy Value, Premium Payments made or active participation in specific online or e-delivery service programs at the time a service charge is assessed.

1. If Your Policy Value or sum of Premium Payments minus all withdrawals equals or exceeds:

 $\begin{bmatrix} \$50,000 \end{bmatrix}$ = up to a $\begin{bmatrix} \$35 \end{bmatrix}$ fee waiver = up to a $\begin{bmatrix} \$55 \end{bmatrix}$ fee waiver

2. Enrollment in specific online or e-delivery service programs may result in up to a \$20 fee waiver.

Transfer Minimums and Charges Before the Annuity Commencement Date

Transfers Allowed Without Charges in any One Policy Year:	
Charges After Allowable Transfers in any One Policy Year:	[\$10]
Minimum Transfer Amount from a Subaccount:	\$500 or the entire Subaccount Policy Value, if less
Minimum Transfer Amount from a GPO:	\$50

Fixed Account Transfer Maximum Before the Annuity Commencement Date

Maximum Transfer from the GPO when EIA has no Impact or a Positive Impact:	100% of the GPO's Value
Maximum Transfer from the GPO when EIA has a Negative Impact:	25% of the GPO's Value

Dollar Cost Averaging (DCA)

DCA Source Account Minimum:	\$3,000
Minimum Amount of each Transfer:	[\$500]
Minimum Time DCA can be Scheduled:	[6 months]
Maximum Time DCA can be Scheduled:	[24 months]

NIC12 PDB50513 Page 5(c)

Fund Facilitation Fee

A Fund Facilitation Fee may be charged in addition to any policy fees and charges, and will be used in the calculation of net investment factor as described in Section 7 of the policy. The Fund Facilitation Fee will only be charged when money is allocated to one of the Subaccounts listed with a Fund Facilitation Fee. The Fund Facilitation Fee is an annualized percentage taken from the daily net asset values of a fund share held in that Subaccount.

We may update Fund Facilitation Fee funds and charge up to the maximum of 0.30% for Subaccounts made available subsequent to the Policy Date. The Subaccount(s) as of Your Policy Date which include this fee are listed below with the current fee noted after the Subaccount name.

Initial Investment Options:

Fixed Account(s):

1 Year Fixed Guaranteed Period

3 Year Fixed Guaranteed Period

5 Year Fixed Guaranteed Period

7 Year Fixed Guaranteed Period

Subaccounts:

AllianceBernstein Balanced Wealth Strategy Portfolio (0.20%)

AllianceBernstein Growth and Income Portfolio

American Funds - Asset Allocation Fund (0.30%)

American Funds - Bond Fund (0.30%)

American Funds - Growth Fund (0.30%)

American Funds - Growth - Income Fund (0.30%)

American Funds - International Fund (0.30%)

Fidelity VIP Balanced Portfolio

Fidelity VIP Contrafund ® Portfolio

Fidelity VIP Mid Cap Portfolio

Fidelity VIP Value Strategies Portfolio

GEI Total Return Fund (0.20%)

TA AEGON Money Market

TA AEGON High Yield Bond

TA AEGON Tactical Vanguard ETF - Balanced

TA AEGON Tactical Vanguard ETF - Conservative

TA AEGON Tactical Vanguard ETF - Growth

TA AEGON U.S. Government Securities

TA AllianceBernstein Dynamic Allocation

TA Asset Allocation - Conservative

TA Asset Allocation - Growth

TA Asset Allocation - Moderate

TA Asset Allocation - Moderate Growth

TA BlackRock Global Allocation (0.10%)

TA BlackRock Large Cap Value

TA BlackRock Tactical Allocation

TA Clarion Global Real Estate Securities

TA Efficient Markets

(Investing in Vanguard®ETFs and Dimensional Fund Advisors Mutual Funds)

TA Hanlon Income

TA International Moderate Growth

TA Janus Balanced

TA JPMorgan Core Bond

TA JPMorgan Enhanced Index

TA JPMorgan Mid Cap Value

TA JPMorgan Tactical Allocation

TA Jennison Growth

TA Legg Mason Dynamic Allocation - Balanced

TA Legg Mason Dynamic Allocation - Growth

TA Market Participation Strategy

TA MFS International Equity

TA Morgan Stanley Active International Allocation

TA Morgan Stanley Capital Growth

TA Morgan Stanley Mid-Cap Growth

TA Multi-Managed Balanced

TA Multi Managed Large Cap Core

TA PIMCO Real Return TIPS

TA PIMCO Tactical - Balanced

TA PIMCO Tactical - Conservative

TA PIMCO Tactical - Growth

TA PIMCO Total Return

TA Systematic Small/Mid Cap Value

TA T. Rowe Price Small Cap

TA Vanguard ETF Index - Conservative

TA Vanguard ETF Index - Balanced

TA Vanguard ETF Index - Growth

TA Vanguard ETF Index - Aggressive

TA WMC Diversified Growth

NIC12 PDB50513 Page 5(d)



Home Office:
4333 Edgewood Road N.E.
Cedar Rapids, Iowa 52499
(319)355-8511

WAIVER OF SURRENDER CHARGE RIDER

We issue this rider as a part of the policy to which it is attached.

The Mortality and Expense Risk Fee and Administrative Charge and the Withdrawal/Surrender Charges will be amended to reflect the following, which is also shown in Section 2, Policy Data provision, of Your policy:

Mortality and Expense Risk Fee and Administrative Charge

Before the Annuity Commencement Date:	[1.20%]
After the Annuity Commencement Date:	[1.25%]

Withdrawal/Surrender Charges

At anytime, you may withdraw or Surrender the Policy Value without surrender charges.

This rider is effective on the Policy Date and can only be terminated when the policy to which this rider is attached terminates. This rider is subject to all the terms and conditions of the policy not inconsistent herewith.

Signed for us at our home office.

SECRETARY

PRESIDENT

SECTION 2 – POLICY DATA

Policy Information

Policy Number:	[12345]
Policy Date:	May 1, 2013
Income Tax Status of the Policy:	Non-Qualified
Initial Premium Payment:	\$5,000.00
Last Available Annuity Commencement Date:	May 31, 2077
Death Benefit Option:	Policy Value

Annuitant(s) Information

Annuitant(s):	John Doe
Primary Annuitant's Issue Age/Sex:	35 / Male

Owner(s) Information

Owner(s):	John Doe
Primary Owner's Issue Age/Sex:	35 / Male

Rate Information for Fixed Account, if offered

Fixed Account Guaranteed Minimum Effective Annual Interest Rate:*	0.25%
Minimum Nonforfeiture Interest Rate:**	1.00%

^{*}This rate applies for the life of the policy.

Regarding the Excess Interest Adjustment (EIA) feature:

- a. The guaranteed elements used to determine any EIA are the minimum guaranteed and current declared interest rates applicable to the Fixed Account;
- b. Declared interest rates used in computing any EIA may change from time to time (subject to Fixed Account Guaranteed Minimum Effective Annual Interest Rate), which may affect the benefits available under Your policy; and
- c. The U.S. Treasury rate may be used as a substitute for the current declared interest rate in the EIA formula as specified in Your policy.

NIC12 PDC50513 Page 5(a)

^{**}This rate applies for the life of the policy. This rate is used in the calculation of Your Minimum Required Cash Value. Your Minimum Required Cash Value reflects a 12.50% reduction in premiums and transfers to the Fixed Account and a \$50 annual expense allowance. See the definition of Minimum Required Cash Value for the details of this calculation.

Minimum Premium Payments

Minimum Initial Premium Payment:	Non-Qualified -\\$5,000 Qualified -\\$1,000
Minimum Subsequent Premium Payment:	[\$50]

Maximum Premium Payments (without prior Company Approval)

	Issue Age 0-80*	Issue Age 81+*
Total during the 1st Policy Year:	\$1,000,000	\$500,000
Total during each Policy Year After 1st Policy Anniversary:	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit
Cumulative Maximum Premiums - Life of Policy:	\$1,000,000	\$500,000

^{*} Issue Age is the greater of the Owner(s)' or Annuitant(s)' age.

Mortality and Expense Risk Fee and Administrative Charge

Before the Annuity Commencement Date:	[1.20%]
After the Annuity Commencement Date:	[1.25%]

Withdrawal/Surrender Charges

At anytime, you may withdraw or Surrender the Policy Value without surrender charges.

The amount paid on Surrender will never be less than the greater of the following amounts:

- a. Cash Value described in Section 5; and
- b. Minimum Required Cash Value.

NIC12 PDC50513 Page 5(b)

Service Charge

Service Charge at the Time of Issue:	[\$35]
Maximum Annual Service Charge:	[\$55]

The Company may waive some or all of Your service charge each year based on Your Policy Value, Premium Payments made or active participation in specific online or e-delivery service programs at the time a service charge is assessed.

1. If Your Policy Value or sum of Premium Payments minus all withdrawals equals or exceeds:

 $\begin{bmatrix} \$50,000 \end{bmatrix}$ = up to a $\begin{bmatrix} \$35 \end{bmatrix}$ fee waiver = up to a $\begin{bmatrix} \$55 \end{bmatrix}$ fee waiver

2. Enrollment in specific online or e-delivery service programs may result in up to a \$20 fee waiver.

Transfer Minimums and Charges Before the Annuity Commencement Date

Transfers Allowed Without Charges in any One Policy Year:	
Charges After Allowable Transfers in any One Policy Year:	[\$10]
Minimum Transfer Amount from a Subaccount:	\$500 or the entire Subaccount Policy Value, if less
Minimum Transfer Amount from a GPO:	\$50

Fixed Account Transfer Maximum Before the Annuity Commencement Date

Maximum Transfer from the GPO when EIA has no Impact or a Positive Impact:	100% of the GPO's Value
Maximum Transfer from the GPO when EIA has a Negative Impact:	25% of the GPO's Value

Dollar Cost Averaging (DCA)

DCA Source Account Minimum:	\$3,000
Minimum Amount of each Transfer:	[\$500]
Minimum Time DCA can be Scheduled:	[6 months]
Maximum Time DCA can be Scheduled:	[24 months]

NIC12 PDC50513 Page 5(c)

Fund Facilitation Fee

A Fund Facilitation Fee may be charged in addition to any policy fees and charges, and will be used in the calculation of net investment factor as described in Section 7 of the policy. The Fund Facilitation Fee will only be charged when money is allocated to one of the Subaccounts listed with a Fund Facilitation Fee. The Fund Facilitation Fee is an annualized percentage taken from the daily net asset values of a fund share held in that Subaccount.

We may update Fund Facilitation Fee funds and charge up to the maximum of 0.30% for Subaccounts made available subsequent to the Policy Date. The Subaccount(s) as of Your Policy Date which include this fee are listed below with the current fee noted after the Subaccount name.

Initial Investment Options:

Fixed Account(s):

1 Year Fixed Guaranteed Period

3 Year Fixed Guaranteed Period

5 Year Fixed Guaranteed Period

7 Year Fixed Guaranteed Period

Subaccounts:

AllianceBernstein Balanced Wealth Strategy Portfolio (0.20%)

AllianceBernstein Growth and Income Portfolio

American Funds - Asset Allocation Fund (0.30%)

American Funds - Bond Fund (0.30%)

American Funds - Growth Fund (0.30%)

American Funds - Growth - Income Fund (0.30%)

American Funds - International Fund (0.30%)

Fidelity VIP Balanced Portfolio

Fidelity VIP Contrafund ® Portfolio

Fidelity VIP Mid Cap Portfolio

Fidelity VIP Value Strategies Portfolio

GEI Total Return Fund (0.20%)

TA AEGON Money Market

TA AEGON High Yield Bond

TA AEGON Tactical Vanguard ETF - Balanced

TA AEGON Tactical Vanguard ETF - Conservative

TA AEGON Tactical Vanguard ETF - Growth

TA AEGON U.S. Government Securities

TA AllianceBernstein Dynamic Allocation

TA Asset Allocation - Conservative

TA Asset Allocation - Growth

TA Asset Allocation - Moderate

TA Asset Allocation - Moderate Growth

TA BlackRock Global Allocation (0.10%)

TA BlackRock Large Cap Value

TA BlackRock Tactical Allocation

TA Clarion Global Real Estate Securities

TA Efficient Markets

(Investing in Vanguard®ETFs and Dimensional Fund Advisors Mutual Funds)

TA Hanlon Income

TA International Moderate Growth

TA Janus Balanced

TA JPMorgan Core Bond

TA JPMorgan Enhanced Index

TA JPMorgan Mid Cap Value

TA JPMorgan Tactical Allocation

TA Jennison Growth

TA Legg Mason Dynamic Allocation - Balanced

TA Legg Mason Dynamic Allocation - Growth

TA Market Participation Strategy

TA MFS International Equity

TA Morgan Stanley Active International Allocation

TA Morgan Stanley Capital Growth

TA Morgan Stanley Mid-Cap Growth

TA Multi-Managed Balanced

TA Multi Managed Large Cap Core

TA PIMCO Real Return TIPS

TA PIMCO Tactical - Balanced

TA PIMCO Tactical - Conservative

TA PIMCO Tactical - Growth

TA PIMCO Total Return

TA Systematic Small/Mid Cap Value

TA T. Rowe Price Small Cap

TA Vanguard ETF Index - Conservative

TA Vanguard ETF Index - Balanced

TA Vanguard ETF Index - Growth

TA Vanguard ETF Index - Aggressive

TA WMC Diversified Growth

NIC12 PDC50513 Page 5(d)



Home Office: 4333 Edgewood Road N.E. Cedar Rapids, Iowa 52499 (319)355-8511

SURRENDER CHARGE MODIFICATION RIDER

We issue this rider as a part of the policy to which it is attached.

The Mortality and Expense Risk Fee and Administrative Charge and the Withdrawal/Surrender Charges will be amended to reflect the following, which is also shown in Section 2, Policy Data provision, of Your policy:

Mortality and Expense Risk Fee and Administrative Charge

Before the Annuity Commencement Date:	Years [1 – 4]
After the Annuity Commencement Date:	[1.25%]

Withdrawal/Surrender Charges

Number of Years Since Premium Payment Date:	0-1	1-2	2-3	3-4	4 or more
Charge (% of Premium Withdrawn):	8%	8%	7%	6%	0%

Signed for us at our home office.

SECRETARY

PRESIDENT

SECTION 2 – POLICY DATA

Policy Information

Policy Number:	[12345]
Policy Date:	May 1, 2013
Income Tax Status of the Policy:	Non-Qualified
Initial Premium Payment:	\$5,000.00
Last Available Annuity Commencement Date:	May 31, 2077
Death Benefit Option:	Policy Value

Annuitant(s) Information

Annuitant(s):	John Doe
Primary Annuitant's Issue Age/Sex:	35 / Male

Owner(s) Information

Owner(s):	John Doe
Primary Owner's Issue Age/Sex:	35 / Male

Rate Information for Fixed Account, if offered

Fixed Account Guaranteed Minimum Effective Annual Interest Rate:*	0.25%
Minimum Nonforfeiture Interest Rate:**	1.00%

^{*}This rate applies for the life of the policy.

Regarding the Excess Interest Adjustment (EIA) feature:

- a. The guaranteed elements used to determine any EIA are the minimum guaranteed and current declared interest rates applicable to the Fixed Account;
- b. Declared interest rates used in computing any EIA may change from time to time (subject to Fixed Account Guaranteed Minimum Effective Annual Interest Rate), which may affect the benefits available under Your policy; and
- c. The U.S. Treasury rate may be used as a substitute for the current declared interest rate in the EIA formula as specified in Your policy.

NIC12 PDBL0513 Page 5(a)

^{**}This rate applies for the life of the policy. This rate is used in the calculation of Your Minimum Required Cash Value. Your Minimum Required Cash Value reflects a 12.50% reduction in premiums and transfers to the Fixed Account and a \$50 annual expense allowance. See the definition of Minimum Required Cash Value for the details of this calculation.

Minimum Premium Payments

Minimum Initial Premium Payment:	Non-Qualified -\\$5,000 Qualified -\\$1,000
Minimum Subsequent Premium Payment:	[\$50]

Maximum Premium Payments (without prior Company Approval)

	Issue Age 0-80*	Issue Age 81+*
Total during the 1st Policy Year:	\$1,000,000	\$500,000
Total during each Policy Year After 1st Policy Anniversary:	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit	Non-qualified - \$25,000 Qualified - Lesser of \$60,000 or IRS Contribution limit
Cumulative Maximum Premiums - Life of Policy:	\$1,000,000	\$500,000

^{*} Issue Age is the greater of the Owner(s)' or Annuitant(s)' age.

Mortality and Expense Risk Fee and Administrative Charge

Before the Annuity	Years 1 - 4 1.65%
Commencement Date:	Years 5 or more 1.15%
After the Annuity Commencement Date:	[1.25%]

Withdrawal/Surrender Charges

Number of Years Since Premium Payment Date:	0-1	1-2	2-3	3-4	4 or more
Charge (% of Premium Withdrawn):	8%	8%	7%	6%	0%

The amount paid on Surrender will never be less than the greater of the following amounts:

- a. Cash Value described in Section 5; and
- b. Minimum Required Cash Value.

NIC12 PDBL0513 Page 5(b)

Service Charge

Service Charge at the Time of Issue:	[\$35]
Maximum Annual Service Charge:	[\$55]

The Company may waive some or all of Your service charge each year based on Your Policy Value, Premium Payments made or active participation in specific online or e-delivery service programs at the time a service charge is assessed.

1. If Your Policy Value or sum of Premium Payments minus all withdrawals equals or exceeds:

 $\begin{bmatrix} $50,000 \end{bmatrix}$ = up to a $\begin{bmatrix} $35 \end{bmatrix}$ fee waiver = up to a $\begin{bmatrix} $55 \end{bmatrix}$ fee waiver

2. Enrollment in specific online or e-delivery service programs may result in up to a \$20 fee waiver.

Transfer Minimums and Charges Before the Annuity Commencement Date

Transfers Allowed Without Charges in any One Policy Year:	
Charges After Allowable Transfers in any One Policy Year:	\$10
Minimum Transfer Amount from a Subaccount:	\$500 or the entire Subaccount Policy Value, if less
Minimum Transfer Amount from a GPO:	\$50

Fixed Account Transfer Maximum Before the Annuity Commencement Date

Maximum Transfer from the GPO when EIA has no Impact or a Positive Impact:	100% of the GPO's Value
Maximum Transfer from the GPO when EIA has a Negative Impact:	25% of the GPO's Value

Dollar Cost Averaging (DCA)

DCA Source Account Minimum:	§ 3,000
Minimum Amount of each Transfer:	[\$500]
Minimum Time DCA can be Scheduled:	[6 months]
Maximum Time DCA can be Scheduled:	[24 months]

NIC12 PDBL0513 Page 5(c)

Fund Facilitation Fee

A Fund Facilitation Fee may be charged in addition to any policy fees and charges, and will be used in the calculation of net investment factor as described in Section 7 of the policy. The Fund Facilitation Fee will only be charged when money is allocated to one of the Subaccounts listed with a Fund Facilitation Fee. The Fund Facilitation Fee is an annualized percentage taken from the daily net asset values of a fund share held in that Subaccount.

We may update Fund Facilitation Fee funds and charge up to the maximum of 0.30% for Subaccounts made available subsequent to the Policy Date. The Subaccount(s) as of Your Policy Date which include this fee are listed below with the current fee noted after the Subaccount name.

Initial Investment Options:

Fixed Account(s):

1 Year Fixed Guaranteed Period

3 Year Fixed Guaranteed Period

5 Year Fixed Guaranteed Period

7 Year Fixed Guaranteed Period

Subaccounts:

AllianceBernstein Balanced Wealth Strategy Portfolio (0.20%)

AllianceBernstein Growth and Income Portfolio

American Funds - Asset Allocation Fund (0.30%)

American Funds - Bond Fund (0.30%)

American Funds - Growth Fund (0.30%)

American Funds - Growth - Income Fund (0.30%)

American Funds - International Fund (0.30%)

Fidelity VIP Balanced Portfolio

Fidelity VIP Contrafund ® Portfolio

Fidelity VIP Mid Cap Portfolio

Fidelity VIP Value Strategies Portfolio

GEI Total Return Fund (0.20%)

TA AEGON Money Market

TA AEGON High Yield Bond

TA AEGON Tactical Vanguard ETF - Balanced

TA AEGON Tactical Vanguard ETF - Conservative

TA AEGON Tactical Vanguard ETF - Growth

TA AEGON U.S. Government Securities

TA AllianceBernstein Dynamic Allocation

TA Asset Allocation - Conservative

TA Asset Allocation - Growth

TA Asset Allocation - Moderate

TA Asset Allocation - Moderate Growth

TA BlackRock Global Allocation (0.10%)

TA BlackRock Large Cap Value

TA BlackRock Tactical Allocation

TA Clarion Global Real Estate Securities

TA Efficient Markets

(Investing in Vanguard®ETFs and Dimensional Fund Advisors Mutual Funds)

TA Hanlon Income

TA International Moderate Growth

TA Janus Balanced

TA JPMorgan Core Bond

TA JPMorgan Enhanced Index

TA JPMorgan Mid Cap Value

TA JPMorgan Tactical Allocation

TA Jennison Growth

TA Legg Mason Dynamic Allocation - Balanced

TA Legg Mason Dynamic Allocation - Growth

TA Market Participation Strategy

TA MFS International Equity

TA Morgan Stanley Active International Allocation

TA Morgan Stanley Capital Growth

TA Morgan Stanley Mid-Cap Growth

TA Multi-Managed Balanced

TA Multi Managed Large Cap Core

TA PIMCO Real Return TIPS

TA PIMCO Tactical - Balanced

TA PIMCO Tactical - Conservative

TA PIMCO Tactical - Growth

TA PIMCO Total Return

TA Systematic Small/Mid Cap Value

TA T. Rowe Price Small Cap

TA Vanguard ETF Index - Conservative

TA Vanguard ETF Index - Balanced

TA Vanguard ETF Index - Growth

TA Vanguard ETF Index - Aggressive Growth

TA WMC Diversified Growth

NIC12 PDBL0513 Page 5(d)



Home Office:

4333 Edgewood Road N.E.
Cedar Rapids, Iowa 52499
(319)355-8511

GUARANTEED MINIMUM DEATH BENEFIT RIDER

If You elect this rider, 100% of Your Policy Value must be in one or more of the designated funds. You can generally transfer between the designated funds as permitted under Your policy; however, You cannot make transfers as provided for in the base policy to a non-designated fund.

The fee for this rider is included in the mortality and expense risk fee and the administrative charge, which is shown in Section 2, Policy Data provision, of the policy to which this rider is attached.

The Guaranteed Minimum Death Benefit (GMDB) provision in the Death Proceeds section of the policy to which this rider is attached, is amended to include the addition of the following language:

The Guaranteed Minimum Death Benefit is an Annual Step-Up to age [81] Death Benefit. The amount of this GMDB is equal to:

- a) the step-up value as described below; plus
- b) any Premium Payments subsequent to the previous determination point; minus
- c) any Adjusted Withdrawals subsequent to the previous determination point.

On the Policy Date, the step-up value is the Policy Value. On each Policy Anniversary (referred to as the determination points) prior to the earlier of the date of death of the Annuitant or the Annuitant's [81st] birthday, a comparison is made between (a) and (b), where (a) is the Policy Value at this point in time and (b) is the previous step-up value, plus Premium Payments minus Adjusted Withdrawals (as described below) made since the previous determination point. The larger of (a) and (b) becomes the new step-up value. This step-up process stops at the earlier of the date of death of the Annuitant or the Annuitant's [81st] birthday. The then current step-up value becomes the final step-up value.

A withdrawal as provided in Section 5 of the policy will reduce the Guaranteed Minimum Death Benefit by an amount referred to as the "Adjusted Withdrawal". The Adjusted Withdrawal may be a different amount than the gross withdrawal described in Section 5 of the policy. If at the time of the withdrawal, the Policy Value is greater than or equal to the death proceeds, the Adjusted Withdrawal will equal the gross withdrawal. If at the time of the withdrawal, the Policy Value is less than the death proceeds, the Adjusted Withdrawal will be greater than the gross withdrawal.

The Adjusted Withdrawal formula is AW = GW multiplied by DP divided by PV, where:

AW = Adjusted Withdrawal GW = Gross withdrawal

DP = Death proceeds prior to the withdrawal = greatest of (PV, CV, or GMDB)

PV = Policy Value prior to the withdrawal

GMDB = Guaranteed Minimum Death Benefit prior to the withdrawal

CV = Cash Value prior to the withdrawal

The death benefit amount cannot be withdrawn as a lump sum.

The amount of the death benefit will be included in a report sent to You at least once each year until the Annuity Commencement Date as described in Section 3, Reports to Owner provision, in the policy.

This rider is effective on the Policy Date and can only be terminated when the policy to which this rider is attached terminates, including when the Policy Value becomes zero, or is annuitized. Once terminated the rider fee will also terminate. This rider is subject to all the terms and conditions of the policy not inconsistent herewith. In the event of any conflict between the provisions of this rider and provisions of the policy, the provisions of this rider shall prevail over the provisions of the policy.

Signed for us at our home office.

SECRETARY

PRESIDENT



Home Office: 4333 Edgewood Road N.E. Cedar Rapids, Iowa 52499 (319)355-8511

GUARANTEED MINIMUM DEATH BENEFIT RIDER

If You elect this rider, 100% of Your Policy Value must be in one or more of the designated funds. You can generally transfer between the designated funds as permitted under Your policy; however, You cannot make transfers as provided for in the base policy to a non-designated fund.

The fee for this rider is included in the mortality and expense risk fee and the administrative charge, which is shown in Section 2, Policy Data provision, of the policy to which this rider is attached.

The Guaranteed Minimum Death Benefit provision in the Death Proceeds Section of the policy to which this rider is attached, is amended to include the addition of the following language:

The amount of this Guaranteed Minimum Death Benefit is equal to 100% of the total premiums paid for this policy, less any Adjusted Withdrawals (as described below), as of the date of death.

A withdrawal will reduce the Guaranteed Minimum Death Benefit by an amount referred to as the "Adjusted Withdrawal". The Adjusted Withdrawal may be a different amount than the gross withdrawal. If at the time of the withdrawal, the Policy Value is greater than or equal to the death proceeds, the Adjusted Withdrawal will equal the gross withdrawal. If at the time of the withdrawal, the Policy Value is less than the death proceeds, the Adjusted Withdrawal will be greater than the gross withdrawal.

The Adjusted Withdrawal is equal to the gross withdrawal multiplied by the death proceeds immediately prior to the withdrawal divided by the Policy Value immediately prior to the withdrawal. The formula is $AW = GW \times (DP/PV)$ where:

GW = Gross withdrawal

DP = Death proceeds prior to the withdrawal = greatest of (PV, CV, or GMDB)

PV = Policy Value prior to the withdrawal

GMDB = Guaranteed Minimum Death Benefit prior to the withdrawal

CV = Cash Value prior to the withdrawal

The death benefit amount cannot be withdrawn as a lump sum.

The amount of the death benefit will be included in a report sent to You at least once each year until the Annuity Commencement Date as described in Section 3, Reports to Owner provision, in the policy.

This rider is effective on the Policy Date and can only be terminated when the policy to which this rider is attached terminates, including when the Policy Value becomes zero, or is annuitized. Once terminated the rider fee will also terminate. This rider is subject to all the terms and conditions of the policy not inconsistent herewith. In the event of any conflict between the provisions of this rider and provisions of the policy, the provisions of this rider shall prevail over the provisions of the policy.

Signed for us at our home office.

SECRETARY

PRESIDENT



Home Office:
Transamerica Life Insurance Company
4333 Edgewood Road N.E.
Cedar Rapids, Iowa 52499
(319)355-8511

AMENDATORY ENDORSEMENT

Effective Date of Amendatory Endorsement: May 1, 2013

This endorsement is attached to and made part of your policy, contract or certificate ("policy") by Transamerica Life Insurance Company ("Company"). As this policy is issued as an investment or funding vehicle for a qualified or tax-advantaged retirement plan ("Plan") in which the Annuitant participates, as specified in the application, it is amended by the addition of the following provisions in order to comply with applicable requirements of the Internal Revenue Code ("Code").

- 1. This policy is non-transferable. In accordance with Section 401 of the Code, no portion of the Annuitant's interest in the policy can be transferred or assigned to any person other than the Company. This provision shall not limit the Plan's ability to transfer the policy to the Annuitant.
- 2. In accordance with Section 401 of the Code, this policy may not be sold, assigned, discounted, or pledged as collateral for a loan or as security for the performance of an obligation or for any other purpose, to any person other than this Company.
- 3. The Company shall generally pay benefits under the policy to the Plan (or, if the policy is held in a trust for the Plan, to the Plan trustee). The Company may receive instructions from the policy owner, or, acting on behalf of the owner, the Plan administrator or other Plan fiduciary (or other person acting on behalf of the owner or Plan) and shall be fully protected and held harmless in following the instructions of such person as to payment of amounts under the policy.
- 4. Loans will not be made by the Company from the policy.
- 5. If required by Section 401(a)(11) of the Code and the Plan, a joint and survivor annuity for a married Annuitant will automatically be applied if no other option has been elected as a settlement option at the Annuity Commencement Date. Where applicable, other options may require spousal consent.
- 6. The purchase of the policy by the Plan results in no additional tax deferral benefits under the Code beyond those provided under a qualified retirement plan. The policy should be used to fund the Plan based on the policy's features other than tax deferral. These features include, but are not limited to, the investments available for allocation under the policy's guaranteed lifetime income and death benefits.
- 7. Premium payments paid to the Company are subject to the terms of the Plan and the applicable provisions of the Code including, but not limited to, maximum contribution limitations set forth in Sections 402(g) and 415 of the Code.
- 8. In accordance with the provisions of Code Section 401(a)(9)(C), benefit distributions must begin by April 1st of the calendar year following the later of the calendar year in which the Annuitant attains age 70-1/2 or, if the Annuitant is not a 5% owner of his employer as defined in Code Section 401(a)(9)(C), the calendar year in which the Annuitant retires.
- 9. In accordance with Section 72(t) of the Code, payments received from this policy by the Annuitant prior to becoming disabled or attaining age 59-1/2 may be subject to a 10% penalty tax in addition to any increase in the regular income tax which may result from including the distribution in gross income.

- 10. In accordance with Section 401 of the Code, the Annuitant may be restricted from taking a distribution from the Plan prior to certain events such as: death, severance/separation from employment, disability within the meaning of the Code, attainment of age 59-1/2, or in certain cases of hardship. The Company shall follow the instructions of the policy owner, or, acting on behalf of the owner, the Plan administrator or other Plan fiduciary (or other person acting on behalf of the owner or Plan) as to the terms of the Plan.
- 11. In accordance with Section 417 of the Code, unisex mortality tables will be used in the administration of the policy purchased by the Plan.
- 12. Pursuant to Treasury Regulation 1.404(a)-8, any refunds of premiums (i.e., payments by the Company on account of credits such as dividends, experience rating credits, or surrender or cancellation credits) shall be applied within the taxable year of employer in which received or within the next succeeding taxable year toward the purchase of retirement annuities under the Plan.
- 13. The Plan shall comply with the tax qualified plan provisions to prevent loss of the advantages of tax deferral and to prevent tax penalties.

Executed at our Home Office.

Craig D. Vermes

SECRETARY

Frenda Classey.

NIC12 AE13050513

State: Arkansas Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: A03I Individual Annuities - Deferred Variable/A03I.002 Flexible Premium

Product Name: NIC12 PDB50513 et.al.
Project Name/Number: /NIC12 PDB50513 et.al.

Supporting Document Schedules

		item Status:	Status Date:
Satisfied - Item:	Flesch Certification		
Comments:	These forms are subject to federal jurisdiction	n and accordingly the Flesch requirements do not	apply.
Attachment(s):			
Arkansas Reg 19 cert of	f comp.pdf		
		Item Status:	Status Date:
Satisfied - Item:	Statement of Variability		
Comments:			
Attachment(s):			
ASU SOV.pdf			
ROP SOV.pdf			
SOV C share rider NON	compact.pdf		
SOV Data Pages NON	compact.pdf		
SOV L share rider NON	compact.pdf		
SOV Qual Benefit plan I	NON compact.pdf		

CERTIFICATION OF COMPLIANCE

Company Name: Transamerica Life Insurance Company

Form Title(s): Policy Data Page – 5 year Surrender Charge

Waiver of Surrender Charge Rider

Policy Data Page – Waiver of Surrender Charge

Surrender Charge Modification Rider

Policy Data Page – 4 year Surrender Charge Guaranteed Minimum Death Benefit Rider Guaranteed Minimum Death Benefit Rider

Amendatory Endorsement

Form Number(s): NIC12 PDB50513

NIC12 RDR30513 NIC12 PDC50513 NIC12 RLS20513 NIC12 PDBL0513 NIC12 RGMD50513 NIC12 RGMD80513 NIC12 AE13050513

I hereby certify that to the best of my knowledge and belief, the above form(s) and submission complies with Reg.19 s 10B, as well as the other laws and regulations of the State of Arkansas.

Wash A. Weyer

Wade A. Wenger

Assistant Vice President – Compliance Officer

December 20, 2012

Date

For bracketed items on the rider page NIC12 RGMD50513

Variable Information			
Company Address, Telephone Number	To allow for administrative flexibility. Should the location or telephone number change, this information will be updated accordingly.		
		Minimum	Maximum
Birthday Step-up comparison and Step-up process stops		70th	90th
	To allow for administrative flexibility. Should the	se officers change	e, this information
Secretary and President Signatures	will be updated accordingly.		

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

Any changes to the minimum or maximum of any of the ranges above, would require a refiling and approval prior to use for any new issues.

For bracketed items on the rider page NIC12 RGMD80513

Variable Information			
Company Address, Telephone Number	To allow for administrative flexibility. Should the location or telephone number change, this information will be updated accordingly.		
		Minimum	Maximum
Percentage of Premium		50%	100%
Secretary and President Signatures	To allow for administrative flexibility. Should the will be updated accordingly.	se officers change	e, this information

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

Any changes to the minimum or maximum of any of the ranges above, would require a refiling and approval prior to use for any new issues.

For bracketed items on the rider page NIC12 RDR30513

Variable Information			
To allow for administrative flexibility. Should the location or telephone no change, this information will be updated accordingly.			one number
Mortality and Expense Risk Fee and Administrative Charge Minimum Max			Maximum
Before Annuity Commencement Date		0.30%	2.50%
After Annuity Commencement Date		0.30%	2.50%
Secretary and President Signatures	To allow for administrative flexibility. Should the will be updated accordingly.	se officers change	e, this information

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

As required by the product standards, any changes to the minimum or maximum of any of the ranges above, would require a refiling.

For bracketed items on the Policy Data Page NIC12 PDB50513, NIC12 PDC50513, NIC12 PDBL050513

Variable Information		
Policy Information		
1 Policy Number:	Owner specific	
2 Policy Date:	Owner specific	
3 Income Tax Status of the Policy:	Owner specific	
4 Initial Premium Payment:	Owner specific	
5 Last Available Annuity Commencement Date:	Calculated date that is Ov	wner specific
6 Death Benefit Option:	Selected by Owner;	
	Policy Value	
	Return of Premium (available	,
	Annual Step-up (available a	s a rider)
Annuitant(s) Information		
7 Annuitant(s):	Owner specific	
8 Primary Annuitant's Issue Age/Sex	Owner specific	
Owner(s) Information		
9 Owner(s):	Owner specific	
10 Primary Owner's Issue Age/Sex:	Owner specific	
	Minimum	Maximum
Rate Information for Fixed Account		
11 Fixed Account Guaranteed Minimum Effective Annual Interest Rate:	0.25%	3.00%
12 Minimum Nonforfeiture Interest Rate:	1.00%	3.00%
Minimum Premium Payments	<u> </u>	
13 Minimum Initial Premium Payment (Non-Qualified):	\$0	\$25,000
14 Minimum Initial Premium Payment (Qualified):	\$0	\$5,000
15 Minimum Subsequent Premium Payment:	\$0	\$500
Maximum Premium Payments:		*
16 Total during the 1st Policy Year (Issue Age 0-80):	\$500,000	\$2,000,000
17 Total during the 1st Policy Year (Issue Age 81+):	\$100,000	\$1,500,000
18 Total during each Policy Year After 1st Policy Anniversary (Issue Age 0-80) NonQual:	\$5,000	\$100,000
19 Total during each Policy Year After 1st Policy Anniversary (Issue Age 80+) NonQual:	\$5,000	\$100,000
20 Total during each Policy Year After 1st Policy Anniversary (Issue Age 0-80) Qualified:	\$5,000	\$100,000
21 Total during each Policy Year After 1st Policy Anniversary (Issue Age 80+) Qualified:	\$5,000	\$100,000
22 Cumulative Maximum Premiums - Life of Policy (Issue Age 0-80):	\$500,000	\$2,000,000
23 Cumulative Maximum Premiums - Life of Policy (Issue Age 81+):	\$100,000	\$1,500,000

	Minimum	Maximum
Mortality and Expense Risk Fee and Administrative Charge		
24 Years, if applicable	1	9
25 Before Annuity Commencement Date	0.30%	2.50%
26 Years, if applicable	4	9
27 Before Annuity Commencement Date	0.30%	2.50%
28 After Annuity Commencement Date	0.30%	2.50%
Service Charge		
29 Service Charge at the Time of Issue:	\$0	\$75
30 Maximum Annual Service Charge:	\$0	\$75
31 Threshold for waiver of Service Charge up to [\$35] fee waiver:	\$25,000	\$250,000
32 Amount of Service Charge waived when [\$50,000] threshold met:	\$0	\$75
33 Threshold for waiver of Service Charge up to [\$55] fee waiver:	\$50,000	\$500,000
34 Amount of Service Charge waived when [\$250,000] threshold met:	\$0	\$75
35 Amount waived of the Service Charge when enrolled in online/edelivery service:	\$0	\$75
Transfer Minimums and Charges Before the Annuity Commencement Date		
36 Transfers Allowed Without Charges in any One Policy Year:	0	12
37 Charges After Allowable Transfers in any One Policy Year:	\$0	\$30
38 Minimum Transfer Amount from a Subaccount:	\$100	\$1,000
39 Minimum Transfer Amount from a GPO:	\$25	\$100
Fixed Account Transfer Maximum Before the Annuity Commencement Date		
40 Maximum Transfer from the GPO when EIA has no Impact or a Positive Impact:	10%	100%
41 Maximum Transfer from the GPO when EIA has a Negative Impact:	10%	100%
Dollar Cost Averaging (DCA)		
42 DCA Source Account Minimum:	\$1,000	\$5,000
43 Minimum Amount of each Transfer:	\$500	\$1,000
44 Minimum Time DCA can be Scheduled:	3 months	12 months
45 Maximum Time DCA can be Scheduled:	12 months	24 months
46 Fund Facilitation Fee	0.05%	1.00%
47 Initial Investment Options	Available at time of issue	

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

Declared Interest rates and any associated interest credits only apply for the period of time specified in the policy. The policy also indicates the duration of each of the policy guarantees.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

As required by the product standards, any changes to the minimum or maximum of any of the ranges above, would require a refiling.

Conditions under which the variable item may change:

Since there are many dependencies among the variables, a change in one item could necessitate a change in other related items.

Therefore, a summary follows which describes generally how the variables can change in conjunction with each other, due to changes in market conditions (and related revisions which may be needed for pricing purposes).

I. High interest rate environment (ie., market rates are expected to increase)

The current credited interest rate is the main "driver" of the other interest rate variables in a rising rate environment. If current credited rates increase, then:

- Service Charge could increase
- Guaranteed minimum interest rates could increase

- Minimum nonforfeiture interest rate could increase, if Treasury rates increased
- Premium enhancements could possibly be increased on any subsequent premiums if company's pricing can support such increases

The Mortality & Expense Risk Fee & Administrative Charge (before the annuity commencement date) varies depending on whether or not a Guaranteed Minimum Death Benefit has been elected. While the asset charge varies depending on the GMDB elected, the charge should be quite uniform across all future owners with the same GMDB. The percentage applicable to each policy on the issue date applies for the entire accumulation phase of that policy.

The Mortality & Expense Risk Fee & Administrative Charge (after the annuity commencement date) covers the administrative and longevity risks anticipated during the annuity payment phase of the policy. It is anticipated that this charge may only vary slightly, if at all, for future issues. This charge is fixed at issue for each owner's policy and is the only charge applicable after the annuity commencement date.

II. Low interest rate environment (ie., market rates are expected to decrease)

The minimum nonforfeiture interest rate is the main "driver" of the other interest rate variables in a decreasing interest rate environment

If this rate decreases due to general decreases in Treasury rates, then:

- current interest rates could decrease
- guaranteed minimum interest rates could decrease.

III. Interest rates increase or decrease (i.e., regardless of the interest rate environment)

For future issues, DCA assumptions, fixed account maximum transfers, minimum transfers, and transfer charges are not expected to vary from those anticipated at the time of issue.

For bracketed items on the rider page NIC12 RLS20513

Variable Information			
Company Address, Telephone Number	To allow for administrative flexibility. Should the location or telephone number change, this information will be updated accordingly.		
Mortality and Expense Risk Fee and Administrative Charge		Minimum	Maximum
Years		1	9
Before Annuity Commencement Date		0.30%	2.50%
Years		4	9
Before Annuity Commencement Date		0.30%	2.50%
After Annuity Commencement Date		0.30%	2.50%

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

As required by the product standards, any changes to the minimum or maximum of any of the ranges above, would require a refiling.

Statement of Variability For bracketed items on the rider page NIC12 AE13050513

Variable Information	
Company Address, Telephone Number	To allow for administrative flexibility. Should the location or telephone number change, this information will be updated accordingly.
Effective Date of Amendatory Endorsement	The effective date of the tax qualified plan provision. Once set, this date will not change and will be used for all issues.
Secretary and President Signatures	To allow for administrative flexibility. Should these officers change, this information will be updated accordingly.

Company methodology used in establishing reasonable and realistic ranges for the variables

The company has established ranges for the bracketed items that it considers reasonable, based on the following criteria: 1) pricing considerations, 2) possible future economic environment, 3) competitor considerations.

The anticipated value at time of first sale within each range is based on interest rate setting methodology and related market interest rates at the time of filing.

The degree of change in any one variable (for future issues only) depends on the severity of the change in economic conditions, company reserve liability requirements, the frequency and duration of competitors' change(s) for the same variables, and any change in pricing methodology.

The company anticipates that only significant changes in the economic environment would cause it to decrease a value to the minimum, or increase it to the maximum. Assuming a stable future environment (ie., minimal to moderate changes in the economy), and competitor behaviors that are expected to be similar to our company, any variation for future issues is anticipated to be minimal, if at all.

All policies and riders will be administered in a uniform and non-discriminatory manner, and while some of the items could vary for future issues, all policies or riders issued to a class of policyholders, with the same benefits or options, on the same day will receive the same values for each item. To the extent the company realizes savings in acquisition and / or administration costs specific to a class of policyholders, such as a class composed of policyholders who have purchased through a unique distributor or distribution channel, the company may pass along all or some of the savings through reduced fees, charges or increased benefits to such policyholders.

As required by the product standards, any changes to the minimum or maximum of any of the ranges above, would require a refiling.